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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 OAKLAND DIVISION

16 UNITED STATES OF AMERICA,) CIVIL ACTION NO. CV 13-02340-SBA
17 Plaintiff,)
18 v.)
19 REUNION MORTGAGE, INC.; R. KENT)
20 HARVEY; AND DAVID THAYER,)
21 Defendants.)
22)
23)
24)
25)
26)
27)
28)

22 IT IS HEREBY STIPULATED by the United States of America and Defendants Reunion
23 Mortgage, Inc., R. Kent Harvey, and David Thayer (collectively, the Parties), through undersigned
24 counsel, that:

25 1. Pursuant to Fed. R. Civ. R. 41(a)(1)(A)(ii) and subject to the terms of the May 16,
26 2014 settlement agreement (Settlement Agreement) executed by the Parties, the United States of
27 America dismisses with prejudice all claims asserted by the United States in this action.
28

STIPULATION TO DISMISS
U.S. V. REUNION MORTGAGE, INC. ET AL. (SBA)

1
2 2. The Parties request that the status conference scheduled for May 28, 2014, be vacated.

3 3. According to the terms of the Settlement Agreement, this Court retains jurisdiction over any
4 disputes that may arise relating to the Settlement Agreement.

5 Respectfully submitted,

6 MELINDA HAAG
7 United States Attorney

8 Dated: May 21, 2014

By: _____/s/_____
9 ILA C. DEISS
Assistant United States Attorney
10 Counsel for the United States

11 Dated: May 21, 2014

By: _____/s/_____
12 JOSHUA A. ROSENTHAL
Counsel for Defendants

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14
15 **[PROPOSED] ORDER**

16 PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:

17 1. Pursuant to the terms and conditions of the Parties' May 16, 2014 Settlement
18 Agreement, all claims asserted by the United States are dismissed with prejudice.
19
20 2. The status conference scheduled for May 28, 2014, is vacated.
21
22 3. The clerk shall close the file.
23
24 4. The Court shall retain jurisdiction over any disputes that may arise relating to the Parties' May
25 16, 2014 Settlement Agreement.

26 Dated: 5/21/2014


27 HON. SAUNDRA B. ARMSTRONG
28 United States District Judge